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BACKGROUND

For nearly two years, representatives of the Toxic Substances Control Program (TSCP) of the California Department of Health Services (CDHS) have been responding to concerns raised by residents of San Rafael in Marin County about a potential threat to public health due to commercial development of an 11-acre property at Second and Lindaro streets, a site now owned by Pacific Gas and Electric Company (PG&E). This site had been previously occupied by the San Rafael Gas Plant, which from 1875 until 1960 manufactured gas from coal and oil for illumination and heating. A waste product of gasification was lampblack, a black porous material of low density, which was disposed of on the site. Lampblack typically contains polynuclear aromatic hydrocarbons and volatile organic compounds, some of which are considered carcinogenic or otherwise harmful.

For four months beginning in December, 1988, PG&E conducted trenching operations at the site, excavating about 300 cubic yards of contaminated soil. This soil was stockpiled on-site under a plastic tarp until November 13, 1989. With only last-minute notice to the community, the stockpiled soil was then removed by about 20 trucks to a class I landfill for disposal. Soil removal lasted three days. The utility is now leasing the property to the City of San Rafael, which plans to develop the site for a retail project in the months ahead. Contractors for the city have prepared a Soils Management Work Plan and a Consolidated Construction Health and Safety Plan to control dust, monitor air emissions, and protect workers and the public around the site during trenching, grading and earth moving activities related to the project. Those plans have been subject to regulation by California's TSCP, and they were reviewed in a health consultation by the federal Agency for Toxic Substances and Disease Registry (ATSDR) dated August 14, 1990. The ATSDR consultation concluded that while construction activities may pose a health threat at and around the site, the contractor's plans -- if followed -- would be protective of public health.

The ATSDR consultation did not alleviate the concerns of a group of San Rafael residents who have voiced their objections to the construction and have pressed county, state, and other federal authorities to investigate their complaints. While these citizens have raised many issues beyond the scope of this report, much of their concern involves the health of children attending Davidson Middle School, located about 300 meters south of the site (See Appendix A). This school, the only public middle school in the Sab Rafael City School District, has 834 students. In early September, 1990, the concerned citizens went to the school to distribute leaflets warning parents of "untold dangers to your children's health". The flyers suggested that school children had excess symptoms such as fatigue, nausea, headaches, rashes, diarrhea, etc., that may be due to "air-borne contaminants" emanating from the PG&E site (See Appendix B).

There are also concerns that have been raised about the death of a 12-year-old Davidson student on January 1, 1990. The Environmental Epidemiology and Toxicology Branch (EETB) of CDHS was asked by TSCP to look into these health concerns.

We defer to experts in TSCP and the federal ATSDR who have determined that the level of

contamination at the PG&E site is low, that no plausible route of exposure exists when the site is undisturbed, and that health and safety plans are adequate to protect workers and the public during trenching, grading, earth moving and construction at the site. We shall confine our comments here to the health concerns of San Rafael residents and to our medical findings cased on a review of data from the residents, the county coroner's office, site reports and area birth defect and cancer registries.